

February 6, 2019

John Ewell
Tennessee Department of Agriculture
Division of Regulatory Services
P.O. Box 40627
Nashville, TN 37204

RE: Section 18 Emergency Exemption Request
Transform WG™ (sulfoxaflor) – EPA Reg. No. 62719-625
For Control of Tarnished Plant Bug in Cotton (Tennessee)

Dear Mr. Ewell,

This purpose of this letter and the attached submission is to request a section 18 emergency exemption for the use of sulfoxaflor (Transform WG, Dow AgroSciences) to manage tarnished plant bug, *Lygus lineolaris*, in cotton for the 2019 growing season.

Since 2012, cotton producers in Tennessee have used sulfoxaflor to manage tarnished plant bug infestations with great success. Over those years, sulfoxaflor has displaced applications of more toxic insecticides including pyrethroids, organophosphates, carbamates, and neonicotinoids. Transform has become a key component of Tennessee's overall IPM program in cotton because of its high level of efficacy, relative safety to beneficial arthropods and pollinators, and protection of cotton yields. Despite the relatively high cost of Transform, cotton growers and consultants have incorporated Transform into their overall insect management programs. This demonstrates their commitment to selecting safe alternatives to more toxic insecticides. Since its introduction, Transform has reduced overall tarnished plant bug applications and provided significant economic benefits. This is reflected, in part, by having the highest yields on record in Tennessee during the last four years.

Since the cancellation of the Transform WG label in 2015, Tennessee has annually been granted a section 18 emergency exemption to use Transform in cotton. To my knowledge, there have been no reports of adverse effects to the environment or to local beekeepers anywhere this product has been used. Tennessee farmers have demonstrated that Transform WG can be used in accordance with labeled directions to manage tarnished plant bugs in a sustainable manner. The conditions set forth in the previous section 18 applications are essentially identical to those expected in 2019. I am not aware of new or alternative management strategies that are different from the preceding years.

I respectfully ask that you submit this request to the EPA on behalf of Tennessee cotton growers. It is my hope that the EPA will reapprove an emergency exemption. Specific conditions of this section 18 request are identical to those granted in 2018 and are summarized below. In the 2018 authorization letter, the EPA indicated that this use of Transform WG is

eligible for streamlined application under the recertification program (40 CFR 166.20(b)(5)). Thus, I believe the only necessary application materials are letters of request/support (TDA, company, Univ. TN) and the draft label. Please contact me if you require additional information.

Conditions of Transform WG Section 18 Request for 2019:

- Foliar application may be made by air or ground at rates of 1.5-2.25 oz product per acre.
- Do not make more than four applications per acre per season (not to exceed 8.5 oz of Transform WG per acre per year).
- Applications are prohibited when winds speeds are above 10 miles per hour.
- Do not make applications less than 5 days apart.
- The re-entry Interval (REI) is 24 hours after application.
- Do not apply within 14 days of harvest.
- A maximum of 285,000 acre of cotton fields may be treated in Tennessee.

Sincerely,



Scott D. Stewart

Professor and Extension Entomologist

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